

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BRADLEY PETERSON,

Plaintiff,  
v.

Case Number 23-11401  
Honorable David M. Lawson  
Magistrate Judge David R. Grand

JOHN DOW, SGT. JACKSON,  
A. SEMA, PATRICIA ODETTE, ~~JENNIFER C.~~  
~~HESSON, WILLIAM URICH, CITY OF~~  
~~WOODHAVEN, AND STATE OF MICHIGAN,~~

Defendants.

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Mr. Bradley Peterson  
75 Walnut Street  
Belleville, MI 48111  
734.620.1670

John J. Gillooly (P41948)  
GARAN LUCOW MILLER, P.C.  
Attorney for Defendants John Dow,  
Sgt. Jackson, A. Sema, Patricia  
Odette, ~~Jennifer C. Hesson, William~~  
~~Urich, and City of Woodhaven~~  
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**MOTION FOR RESTRAINING ORDER**

## **MOTION FOR RESTRAINING ORDER**

NOW COME Defendants, JOHN DOW, SGT. JACKSON, A. SEMA, PATRICIA ODETTE, and CITY OF WOODHAVEN (collectively referred to as “Defendants”), and respectfully request the entry of a restraining order as to Plaintiff Bradley Peterson pursuant to Rule 65 of the Federal Rules of Civil Procedure. In support of this motion, Defendants state as follows:

1. Plaintiff Bradley Peterson filed a complaint without the assistance of an attorney alleging that certain public officials interfered with his First Amendment right to protest in a public space.

2. On or about January 15, 2024, the undersigned received the attached correspondence directed by Plaintiff to the undersigned entitled “The Plaintiff’s Motions and Request for a Jury Trial or Apologize from Defendants Due to December 15, Deposition Evidence Hearings – Facts-Exhibits in Civil Case.” Please see **Exhibit 1**.

3. It appears as if Exhibit 1 was filed with the Clerk of the United States District Court for the Eastern District of Michigan on January 8, 2024.

4. In various sections of Plaintiff’s “motion,” Plaintiff indicates that the actions by the Defendants have caused Plaintiff to sustain a mental and physical breakdown. Please see **Exhibit 1, note to ¶ 7**.

5. Plaintiff goes on to indicate that the actions of these Defendants have also caused Plaintiff to be “suicidal and homicidal.” Id.

6. The claims noted in the immediately preceding two paragraphs are noted in two sections of those papers recently filed by Plaintiff. Please see **Exhibit 1**.

7. In light of Plaintiff’s clear and unambiguous statements that the actions of these Defendants have caused Plaintiff to have both suicidal and homicidal ideations, Defendants respectfully request the entry of an Order from this Honorable Court precluding Plaintiff from having any contact with any of the Defendants, from entering onto the grounds of Woodhaven City Hall, enjoining Plaintiff from traveling to the residence of any of the Defendants and traveling to the law offices of the undersigned.

8. Defendants further request that any and all further proceedings in this matter be conducted within the four walls of the Theodore Levin United States Courthouse.

9. Simply put, the statements made by Plaintiff cannot and should not be taken lightly especially where, as here, Plaintiff has stated in at least two sections of his recently filed papers that he is suicidal and homicidal as a result of the actions of Defendants.

10. The Defendants and the undersigned will undoubtedly suffer immediate irreparable injury unless a temporary restraining order is issued.

WHEREFORE, Defendants respectfully request the entry of a restraining order compelling Plaintiff to cease and desist with any further threats of self-harm or harm to others and to maintain adequate and assured clear distances from Defendants, the Woodhaven City Hall and the offices of the undersigned pursuant to Rule 65 of the Federal Rules of Civil Procedure.

Respectfully submitted:  
GARAN LUCOW MILLER, P.C.

/s/John J. Gillooly  
JOHN J. GILLOOLY (P41948)  
Attorney for Defendants  
1155 Brewery Park Blvd., Suite 200  
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Dated: February 2, 2024

6326762

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**BRIEF IN SUPPORT OF**  
**MOTION FOR RESTRAINING ORDER**

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In support of their Motion for Restraining Order, Defendants rely upon the statements made by Plaintiff contained within **Exhibit 1** that he is suicidal and homicidal together with well-settled provisions of the Federal Rules of Civil Procedure which authorize the Court to issue a temporary restraining order where, as here, the movant has produced compelling evidence of irreparable and imminent injury.

Respectfully submitted:  
GARAN LUCOW MILLER, P.C.

/s/John J. Gillooly  
JOHN J. GILLOOLY (P41948)  
Attorney for Defendants  
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Dated: February 2, 2024

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**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2024, my assistant, Dena Marie Shealy, electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

- **Mary A. Waddell**  
waddellm1@michigan.gov, bartonb2@michigan.gov,  
whitek31@michigan.gov, fasnaughs@michigan.gov
- **John J. Gillooly**  
jgillooly@garanlucow.com, dshealy@garanlucow.com
- **Henry Ballout**  
hballout@garanlucow.com, aschaaf@garanlucow.com

and I hereby certify that on February 2, 2024, my assistant, Dena Marie Shealy, mailed by United States Postal Service the paper to the following non-ECF participants, with full legal postage prepaid thereon and deposited in the United States mail:

**Mr. Bradley Peterson**  
**75 Walnut Street**  
**Belleville, MI 48111**

Respectfully submitted:

GARAN LUCOW MILLER, P.C.

/s/John J. Gillooly  
JOHN J. GILLOOLY (P41948)  
Attorney for Defendants John Dow,  
Sgt. Jackson, A. Sema, Patricia Odette,  
~~Jennifer C. Hesson~~, William Ulrich, and  
City of Woodhaven  
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